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Sent: Friday, October 10, 2014 10:32 AM

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Subject: Recap and next steps - Lower Duwamish & Portland Harbor WA, OR & EPA meeting - Sep

30, 2014

Attachments: LDW_PH_Comparison093014.docx

Thank you to all of the attendees for taking a few hours to put our heads together between the states and EPA in comparing and contrasting these two regionally important CERCLA mega-sites and the upland source control components. It is well understood that coordinating schedules of so many staff and managers from several different units/divisions/programs across both states is challenging, especially given our workloads and shrinking workforces. But I hope we all also agree that there is great value in doing the difficult up front work of coordinating across programs and agencies for improved outcomes. Meeting face to face was a great opportunity to personalize each other's work and enjoy the many benefits of live communication.

A special thank you and acknowledgement of great staff work and management support by Ecology in coordinating the Sep 29th for a WA & OR staff and management tour of the Lower Duwamish site, as well as state discussions and information sharing and accommodating the meeting between the states and EPA on the 30th. For the OR attendees, this was a truly informing experience and the similarities and contrasts of the LDW and PH sites became very much more in focus and meaningful. It seems obvious that the staff and management of both states and EPA could similarly benefit from touring and discussing both sites. OR DEQ is ready to offer a tour and discussion session here in Portland to facilitate others having this experience and to reciprocate our Ecology colleagues hospitality.

A quick recap of topics discussed at our joint WA-OR-EPA meeting include:

- Each agency's organizational structure and staffing
- A comparison of the Lower Duwamish Waterway and Portland Harbor sites (table attached)
- Study areas (media, upstream inputs, banks)
- RAOs (refinement and use)
- CERCLA & CWA (distinctions and useful overlaps)
- Recontamination (source control sufficiency and agency roles going forward)

Topics we listed together for future discussions include:

- How are ARARs implemented?
- NRWQC specifically
- Regulatory Tools
- Cross-program discussions needed (CERCLA and water programs)
- Correlating water column concentrations to sediment concentrations
- TMDL-like process (loading allocation)
- Effluent limit/benchmark setting calculation models

- Recontamination
- Use of trends analyses
- Prioritization sufficiency for remedy to go forward
- Sequencing cleanup actions

Please note that many of these topics touch on the need to better integrate approaches between CERCLA and CWA programs. While EPA water program staff were unable to join us at the meeting, the states have begun cross-program discussions between Cleanup and Water programs. We are hopeful that coordination between EPA CERCLA and Water programs can join with the states in delving into some of the challenging and timely opportunities to explore potential unities and efficiencies in regulating under both authorities. We look forward to future discussions among various sections of this diverse group and future opportunities to compare and contrast the LDW and PH projects to find regional consistency and meaningful remediation efforts at both sites.

--Alex

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